

ADMINISTRATIVE RULES

Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	2. Date 04/23/2019
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Chapter Transportation Rule 309 - Ambulance Inspection	
4. Subject Revision Of Chapter Transportation Rule 309 Ambulance Inspections	
5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S	6. Chapter 20, Stats. Appropriations Affected
7. Fiscal Effect of Implementing the Rule <input checked="" type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget	
8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input checked="" type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input checked="" type="checkbox"/> Small Businesses (if checked, complete Attachment A)	
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1). \$0-\$500 per year to each Ambulance Service. Removal of outdated equipment and requirements were included to offset most new or additional costs to ambulance services.	
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11. Policy Problem Addressed by the Rule Given the significant changes to industry standards, practices and regulations that have taken place since 1999 WisDOT feels updates and modifications are warranted for Transportation Rule 309.	
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments. Municipal Ambulance Services, Private Ambulance Services and Private Not For Profit Ambulance Services.	
13. Identify the Local Governmental Units that Participated in the Development of this EIA. Municipal Ambulance Services	
14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) <p>There are three types of ambulance services in the State of Wisconsin, private ambulance services, not for profit ambulance services and municipal ambulance services. Several of these ambulance services throughout the state would qualify as a small business under Wis. Stat. s. 227.114. This rulemaking will add minor additional costs to ambulance services by adding some equipment; however, it will also be offset by removing some equipment that was previously required. Many of the revisions made are already in requirements from the federal ambulance build standards and in the Wisconsin Department of Health Services Emergency Medical Services requirements for ambulances.</p> <p>This rulemaking is a revision of the existing Transportation Rule 309 and is updating the rule to be more in line with current practices in ambulance operations in the State of Wisconsin. The State's economy as a whole will see very little if any impact by the rules revision.</p>	
15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule Benefits include having an updated rule as it pertains to ambulance inspections in Wisconsin. This will continue to lead to a very safe and efficient ambulance inspection program in Wisconsin as well as benefit the consumers in Wisconsin	

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and visitors to our State that may come into contact with Emergency Medical Services.

16. Long Range Implications of Implementing the Rule

Long Range Implications include keeping Wisconsin up to date with surrounding states and federal ambulance build standards and will keep emergency medical transportation safe in Wisconsin well into the future.

17. Compare With Approaches Being Used by Federal Government

The Federal Government does not have an ambulance inspection program however they are involved in the build specifications for ambulances and with the rule revision of ch. Trans. 309 this will help Wisconsin keep pace with updated Federal Build Specifications.

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Illinois. Per Illinois Title 77, Chapter I, Subchapter f, part 515, Section 515.830, requires a Federal Department of Transportation vehicle inspection every six months and passing vehicles receive a Safety Sticker. New ambulances and all other ambulance are inspected once per year by one of the 3 inspectors or the supervisor from the Illinois Department of Health for Basic lifesaving equipment and the U.S. General Services Administration's Specification for ambulances (KKK-A-1822F) with exemptions. Equipment carried in ambulances above the Basic lifesaving level is inspected by the ambulance services designated hospital. Inspection also includes audits of licensing requirements of ambulance services and the emergency medical technicians. Currently reviewing the three ambulance build standards, CAAS, NFPA and GSA.

Iowa. Per Iowa Public Health 641 Chapter 132 and joint rule 147A4 requires all ambulances in Iowa to be inspected by one of four Department of Public Health ambulance inspectors at least every three years. The inspections include a limited mechanical inspection as well as an inspection of medical equipment. Medical equipment carried by the services depends on the scope of practice as set by policies and medical direction. Iowa ambulance inspectors can inspect and/or audit equipment and records of any service program every three years or as necessary to ensure compliance with Iowa codes and rules. Inspection also includes audits of licensing requirements of ambulance services and the emergency medical technicians. Currently in the process of reviewing their rules and may adopt in part or whole the CAAS Ground vehicle Standard for Ambulances in the future.

Michigan. Per Michigan Public Health Code Act 368 Section 333.20923 requires any new ambulance, any replaced ambulance or any upgraded ambulance to be inspected by one of the five regional coordinators/inspectors of the Department of Health & Human Services in Michigan before it is licensed to be in service. Spot checks are also done on 25% of ambulances throughout the year in Michigan. Inspections by a certified mechanic are required on ambulances that are purchased that are over two years old. Medical equipment carried varies in Michigan based on the level of service provided. The equipment list provided by Michigan is very similar to the equipment required in Wisconsin. One major difference is all drugs are provided in sealed kits by pharmacists at service designated hospitals. Inspection also includes audits of licensing requirements of ambulance services and the emergency medical technicians. Starting the process to revise rules to state 'certification of a ground ambulance as it relates to structural and mechanical specifications, excluding the paint scheme, must comply with the standards in place at the time of manufacture for federal KKK standards, or; a. CAAS GVS, in its entirety or b. NFPA 1917, in its entirety.'.

Minnesota. Per Minnesota Statute 144E.18 Rule 4690.3300 requires the ambulances to be inspected once every two years by one of the five Minnesota ambulance inspectors as set by Minnesota State Emergency Medical Services Regulatory Board. These inspections are of limited mechanical/lighting inspections and a more in-depth medical equipment inspection. Minnesota ambulances that comply with Federal Specification KKK-A-1822 with exceptions are deemed to comply with State Standards. Minnesota requires a list of basic lifesaving equipment similar to Wisconsin and then requires services with advanced life support licenses to carry equipment that is approved by the licensee's medical director. Inspection also includes audits of licensing requirements of ambulance services and the emergency medical technicians. Minnesota is not currently enforcing the federal build standards. Currently have a workgroup reviewing the GVS-CAAS v1 standard and the NFPA-1917 standards.

19. Contact Name

20. Contact Phone Number

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1-608-220-3246

This document can be made available in alternate formats to individuals with disabilities upon request.

ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

ATTACHMENT A

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1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

The revision is mainly updating equipment and requirements to catch up with industry standards and practices that are already implemented by many ambulance services throughout the state. The expense of the addition of new equipment and requirements will be largely offset by equipment that has been removed from the rule. One area where services may see an additional expense is the requirement of having an annual Department of Transportation inspection the year there is not one performed by the State Patrols Ambulance Inspector on their ambulances. There were estimates gathered from around the state by the State Patrol for this new expense and below you will find an estimate based on the information gathered:

Based on an average around the state the DOT Inspection requirement of having an inspection performed the year the inspection is not performed by the State Patrols Ambulance Inspector. Each ambulance would cost on average \$86.45 and two hours of time out of service. This includes one hour for the inspection and one hour for travel to and from the business where the inspection would be performed. In many cases the inspections would be performed at the Ambulance services own maintenance shop thus deleting one hour.

The fleet size of each service will determine the actual cost. Many services have technicians on staff who will be able to perform these inspections also offsetting the costs.

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2. Summary of the data sources used to measure the Rule's impact on Small Businesses

Numerous conversations with Ambulance Service representatives were conducted around the state with very positive comments and there were no indications that this would cause financial hardships.

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3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- ☐ Less Stringent Compliance or Reporting Requirements
☒ Less Stringent Schedules or Deadlines for Compliance or Reporting
☐ Consolidation or Simplification of Reporting Requirements
☐ Establishment of performance standards in lieu of Design or Operational Standards
☐ Exemption of Small Businesses from some or all requirements
☐ Other, describe:

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4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

Removal of outdated equipment and requirements were included to offset most new or additional costs to ambulance services.

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5. Describe the Rule's Enforcement Provisions

All ambulance services will be required to comply with the revised rule once it is officially enacted.

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6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

☐ Yes ☒ No
